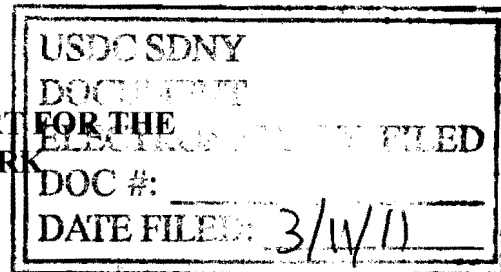


UNITED STATES FEDERAL DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



American Civil Liberties Union  
Center for Constitutional Rights  
Physicians for Human Rights  
Veterans for Common Sense  
Veterans for Peace,

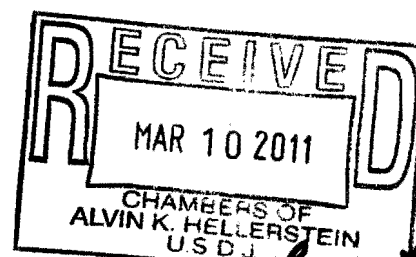
Plaintiffs,

v.

Department of Defense, and its  
Components Department of Army, Dept  
of Navy, Dept. of Air Force, Defense  
Intelligence Agency, Department of  
Homeland Security; Department of  
Justice; and its Components Civil Rights  
Division, Criminal Division, Office of  
Intelligence and Privacy, Office of Intelligence  
Policy and Review, Federal Bureau of  
Investigation; Department of State; and  
Central Intelligence Agency,

Defendants.

Docket No: 04-04151 (AKH)



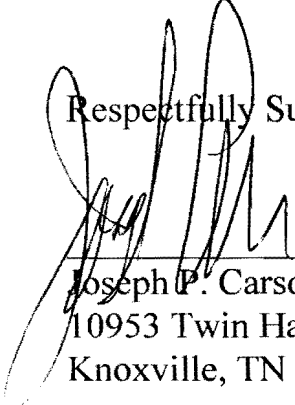
*motion denied. The outlook  
of experienced petitioner, a  
professional engineer employed  
by the Dept of Energy, does  
not suggest the likelihood of  
useful assistance with  
regard to the pending  
motion.*

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of  
Law In Support of Motion for Leave to File Brief, *Amicus Curiae*, together with  
declaration of Joseph Carson and proposed brief of amicus curiae annexed thereto,  
*amicus curiae* Joseph Carson moves this Court before the Honorable Alvin K.  
Hellerstein, United States District Judge, for leave to file the proposed brief  
*amicus curiae*, which is focused only the motion for sanctions, docket no. 254,

which is now being briefed to the Court.

Respectfully Submitted,



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Joseph P. Carson, P.E., Pro Se  
10953 Twin Harbor Dr  
Knoxville, TN 37934 865-300-5831

**TABLE OF CONTENTS FOR MOTION**

(Pursuant to Rule 2(B.) of the Individual Rules of the Honorable Alvin K. Hellerstein, Southern District of New York)

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Memorandum of Law in Support of Motion for Leave to File Brief *Amicus Curiae*

Exhibit 1: CIA FOIA response of March 12, 2010

Exhibit 2: Mr. Carson's FOIA appeal of March 19, 2010

Exhibit 3: CIA acknowledgment of FOIA appeal, April 5, 2010

Exhibit 4: CIA FOIA appeal response of July 19, 2010

Declaration of Joseph P. Carson

Exhibit 1: Proposed Brief of *Amicus Curiae*

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## **CERTIFICATE OF SERVICE**

I certify that the following documents for this case,

1. Notice of Motion
2. Memorandum of Law
3. Declaration of Joseph Carson
4. Brief Amicus Curiae

were served by commercial delivery and email on:

Plaintiffs' Lead Attorney

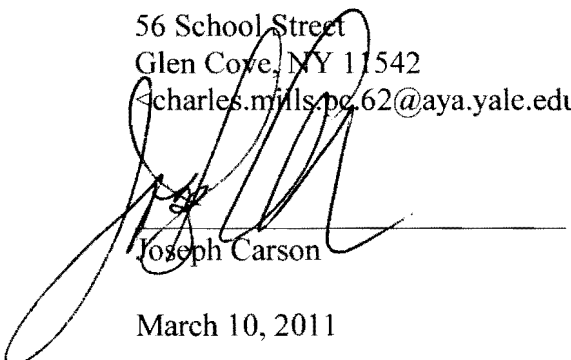
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\_\_\_\_\_  
Joseph Carson

March 10, 2011